

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

THE UNITED STATES OF AMERICA and)	
)	
THE STATE OF ILLINOIS)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:15cv50250
)	
THE CITY OF ROCKFORD, ILLINOIS,)	
)	
)	
Defendant.)	
_____)	

**CONSENT DECREE
APPENDIX I**



ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM

STANDARD OPERATING PROCEDURES

June 2015

1.0 General

The purpose of this standard operating procedure for Illicit Discharge Detection and Elimination program is to comply with Part II, A.7 of the City of Rockford's NPDES Stormwater Permit (ILS000001). This document outlines how to detect and investigate a potential illicit discharge.

Additional guidance can be found in: *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments* by the Center for Watershed Protection.

2.0 Legal Authority

The City has the authority to investigate all reports of illicit connections or illegal dumping within its City limits. Legal authority for the City's Illicit Discharge Detection and Elimination Program can be found in the City of Rockford's Code of Ordinances in Chapter 109, Article 12.

3.0 Definition of Illicit Discharges

An illicit discharge is defined as any discharge that enters the MS4 (municipal separate storm sewer system) that is not composed entirely of stormwater, except discharges pursuant to a National Pollutant Discharge Elimination System (NPDES) permit.

3.1 Allowable Non-stormwater discharges

Illicit discharges are considered "illicit" because storm sewer systems, unlike sanitary sewer systems, are not designed to accept, treat, or discharge non-stormwater wastes. Unless identified by the City of Rockford or Illinois EPA as significant sources of pollutants to waters of the state, Table 1 indicates non-stormwater discharges that shall not be prohibited from entering the MS4 though they should be investigated to confirm they are the only source:

Table 1. Allowable Non Stormwater Discharges	
Waterline Flushing	Foundation drains
Landscape Irrigation	Air conditioning condensate
Diverted stream flows	Irrigation water
Rising ground waters	Springs
Uncontaminated pumped groundwater	Water from crawl space pumps
Discharges from potable water sources	Footing drains
Individual residential car washing	Lawn Watering
Dechlorinated swimming pool discharges	Street wash waters
Flows from riparian habitats and wetlands	Discharges or flows from emergency firefighting activities
Uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005(b)(20)) to separate storm sewers	

3.2 Categories of Illicit discharges

- 1) TRANSIENT – Short in duration, lasting only a short time and then disappearing.
 - a. Examples of potential Direct transient illicit discharges include:
 - i. Intermittent discharges of wash water or process water to the storm sewer through a straight pipe connection from an industrial facility
 - ii. Discharges of non-stormwater to a floor drain that is connected to the storm sewer.
 - iii. Discharges of contaminated stormwater including discharges from industrial facilities that have, but are not in compliance with, a stormwater NDPES permit.
 - b. Examples of potential Indirect transient illicit discharges include:
 - i. Materials that have been dumped into a storm drain inlet or catch basin (Figure 1),
 - ii. An old or damaged sanitary sewer line that is leaking fluids into groundwater that then seeps into a storm sewer line or drainage way, and
 - iii. A failing septic system that is leaking into a cracked storm sewer line.
- 2) CONTINUOUS – Continuing without changing, stopping, or being interrupted. Examples include:
 - a. Sanitary wastewater piping that is cross-connected from a building or sanitary sewer line to the storm sewer,
 - b. A broken sanitary line resulting in discharge of sanitary waste into the storm sewer system(Figure 2), and
 - c. A discharge of process wastewater or other non-stormwater from an industrial facility to the storm sewer system.

3.3 Illicit Discharge Indicators

The following are indicators of potential illicit discharges/connections. An investigation shall be initiated should any of the following be observed:

- Flowing water when there has been 3 days without precipitation
- Discolored water (cloudy, sheen on water, etc.)
- Sediment laden water
- Foul smelling water (i.e. fats, oil, grease from restaurants, sewage)
- Dead fish or animals near water bodies
- Blockages in storm system
- Sanitary sewer overflows
- Basement back-ups
- Floatables
- Staining indicating flows (oily, rust, etc.)

4.0 Staffing

The primary staff from the Stormwater Environmental Team (SWET) responsible for performing illicit discharge investigations shall be the following positions: Engineering Operations Manager, Stormwater Program Manager(s), Stormwater Coordinator and a designated project manager and Engineering Techs.

The following staff from the following City of Rockford departments shall receive annual training for detecting and initiating illicit discharge investigations:

- Community and Economic Development – Inspectors, Enforcement Specialists
- Public Works Streets & Engineering Division, (Engineers, Managers, Technicians, Street Maintenance & supervisors)

When a potential illicit discharge has been observed the bubble chart in Appendix A shall be followed through the investigation process. Staff from the Department of Public Works Stormwater Environmental Team (SWET) shall be responsible for performing outfall inspections and review of illicit discharge complaints and/or observations. Each team member shall be familiar with this document and be trained to recognize potential illicit discharges and the process to initiate an investigation. Project Managers and Senior Engineering Techs can perform inspections provided they are current in their training and are approved to perform inspections by the Engineering Operations Manager and the Stormwater Program Manager(s).

Equipment to perform the investigation can include but not limited to: the field observation or appropriate inspection form, map of the storm system, camera, sample bottles, sampling equipment and personal protection equipment.

Under no circumstances should anyone perform an investigation that could cause bodily harm to themselves or others. In those cases the proper authorities. (i.e. the Fire Department) should be contacted for direction and assistance.

4.1 Safety Procedures

The field activities described in this guide could include sampling of potentially contaminated water and, as such, have some associated risk. As with any field procedures, appropriate precautions should be taken to ensure the safety of field crews. General and specific suggested safety procedures are provided below.

General suggestions:

- While performing field work activities, use appropriate caution, make an effort to recognize potentially dangerous situations while performing field work, and take the proper steps to avoid or minimize them.
- Field work activities should not be performed alone.
- A list of team member and emergency contact numbers should be kept with each field team.
- Long pants and close-toed shoes are required.
- Carry adequate water, sunscreen, and bug repellent if needed.

- Employees should use their judgment to ensure their safety while working during inclement weather. It may be necessary to suspend and/or reschedule field work if the weather will not permit safe and effective completion of the activities. Recommended precautions include:
 - Severe heat or cold: Dress appropriately, take breaks as needed to warm up or cool down, and stay hydrated.
 - Thunderstorms: Stop working, get out of the water, if applicable, and take shelter if there is a threat of lightning strikes.
 - Snowstorms, flooding, tornadoes, and other dangerous weather: Field work should be stopped or canceled if dangerous weather arises or is predicted.
- Each field work team should have a functioning mobile phone and a fully-stocked first aid kit.

Public roadways

- Whenever work will be performed in or near a public roadway, wear a high-visibility safety vest.

Manholes and similar structures

If a manhole cover or similar structure must be removed (in order to determine sewer line configuration, for example):

- Safety-toe footwear (steel-toed shoes) should be worn.
- Lifting manhole covers should be done with the proper tools and technique so as to avoid injury.
- The open cover should only remain open as long as necessary to gather the required information, and should never be left unattended.
- Due to the potential dangers of confined spaces, do not enter a manhole or put your head below the rim of the opening without the proper training.

Stream walks and illicit discharges

- Properly fitting waders with high-traction soles should be worn when walking in a stream.
- Rubber gloves should be worn if contact with polluted water is expected.
- Skin contact with suspected illicit discharges should be avoided.
- Hand sanitizer and/or careful hand washing should be employed after potential contact with polluted water.
- High-visibility orange or yellow vests should be worn.
- Wear safety goggles when performing any chemical tests.
- Reagents and other chemicals should be used and disposed of properly by following the guidance on the MSDS safety sheets.

5.0 Identification of Illicit Discharges

5.1 NPDES Permitted Facilities

During the process of performing industrial and construction inspections these sites will also be checked for illicit discharges and connections pursuant to the Standard Operating Procedures governing the City's Industrial High Risk Runoff Facility Inspection Program and its Erosion & Sediment Control Plan Review and Regulatory Inspections. The Illinois Environmental Protection Agency (IEPA) issues NPDES permits to construction sites and industrial facilities and maintains limited information on permitted sites on their website. This website shall be reviewed as detailed in those standard operating procedures to ensure all NPDES permitted sites identified have obtained the proper City of Rockford approvals.

5.2 Non-Routine Inspections

If an employee observes evidence of an illicit discharge during an informal or non-routine inspection, he/she shall complete the Field Observation Form (Appendix B) and provide it to a supervisor who shall inform a member of SWET by the end of the business day for further follow-up. SWET shall initiate an investigation within 3 business days. While it may not be reasonable to expect all City employees to have copies of the forms at all times, there are other ways to collect the information:

- The person observing the discharge can provide the information verbally to dispatch, the supervisor, or a member of SWET who can then complete the field observation form.
- The person can log information onto the form upon returning to the office based on their recollection and any field notes; or
- A member of SWET dedicated to inspecting and tracing illicit discharges can be sent to the location as soon as possible where the potential illicit discharge was observed to collect the necessary information directly on the form.

It is important to collect as much information as possible at the time of initial observation because of the likelihood that a discharge may be transitory or intermittent. Initial identification of the likely or potential sources of the discharge is also very important.

5.3 Submitted Complaints (i.e. citizens, staff, etc.)

Citizen complaints are a high priority for the City of Rockford. The City has an existing compliance program under which citizens can either call a hotline (779-348-7300) or report an illicit discharge/connection online (www.rockfordil.gov). All complaints from the public will be followed-up with the field inspection by City staff within 3 business days.

Reports to the hotline during normal business hours shall be forwarded directly to a member of SWET. Reports after hours shall be sent to Ocean Remote, a 24 hour service which will have instructions to notify the on-call supervisor. The supervisor shall send a crew to investigate and a field observation form (Appendix B) shall be filled out and provided to a member of the Storm Water & Environmental Team for further investigation.

Complaints submitted online shall be emailed directly to SWET who shall initiate an investigation within 3 business days. See sample below.

You forwarded this message on 8/25/2013 10:46 AM

From: webmaster
To: Dean Keith, Brad Hildner
Cc: [REDACTED]
Subject: Stormwater Complaint Form Submission

Sent: Thu, 8/22/2013 7:59 PM

To view all entries: Login to <http://www.rockford.il.gov/umbraco/umbraco.aspx?content>

NOTE: You must have an existing Umbraco User Account

Name:

Address:

Phone:

Email:

Date of Occurrence:

*Location:

1519 W Jefferson St.

*Description of Problem:

There is standing rain water in front of the house from the alley

Was a commercial vehicle involved:

No

If so, what was the company name or license plate number on the vehicle:

5.4 Dry Weather Screening of Outfalls

Screening of stormwater outfalls is conducted during dry weather to identify potential illicit discharges (i.e., flowing outfalls, staining or other evidence of illicit discharge) and is followed by indicator monitoring to characterize flow types to aid in finding sources. The field screening can also be used to develop a systematic outfall inventory and map of the MS4 (Table 2). Regular inspections of outfalls are a primary part of an effective IDDE program.

Table 2. Outfalls to Include in the Screening

Outfalls to Screen	Features Not to Screen
<ul style="list-style-type: none"> Both large and small diameter pipes that are, or appear to be part of the storm drain infrastructure. Outfalls that appear to be piped headwater streams. Field connections to culverts. Submerged or partially submerged culverts Outfalls blocked with debris or sediment Pipes that appear to be outfalls from stormwater treatment practices Small ductile iron pipes Pipes that appear to only drain roof downspouts but are subsurface to prevent definitive confirmation. 	<ul style="list-style-type: none"> Drop inlets from roads in culverts (unless evidence of illegal dumping) Cross-drainage culverts in transportation right-of-way (i.e. can see daylight at other end) Weep holes Flexible HDPE pipes that are known to serve as slope drains Pipes that are clearly connected to roof downspouts via above ground connections

The inspections shall primarily rely on visual observations and the use of portable instrumentation during dry weather to complete a thorough inspection of the City's outfalls. See Table 1 on the Monitoring Standard Operating Procedures for a list of common indicator parameters used to detect illicit discharges. The protocol is applicable to most typical storm sewer systems; however, modifications to materials and methods may be required to address situations such as open channels, piped stream networks, systems impacted by sanitary sewer overflows, or situations where groundwater or backwater conditions preclude or confound adequate inspection. The primary focus of the protocol is sanitary waste, however, toxic and nuisance discharges may also be identified.

5.4.1 When to conduct an outfall survey?

- To maintain a regular schedule of long-term inspections for outfalls the City shall inspect all known outfalls every even year. The outfall database shall be updated following the even year inspections. Newly located outfalls shall be inspected in the years the City became aware of them.
- Late Fall/Early Spring- outfalls are easiest to spot during leaf-off conditions; however, it may require field work outside of the leaf-off time frame.
- After a dry period of at least 72 hours (trace rainfall activity may be acceptable depending on the size of the watershed).
- Early Morning/Late Afternoon- though not always possible, checking outfalls when people are home may increase the chances of catching an illicit connection.
- Avoid conditions during snow melt and/or if salt has been applied to the road system draining to the outfalls. Also note that some field tests (e.g. ammonia, chlorine) are affected by cold temperatures or confounded by the presence of salt (detergents).

5.4.2 Mapping

The first step to successful field work is to have a map with the necessary information. Data that shall be considered for inclusion on mapping for either outfall screenings or illicit discharge investigation is detailed in Table 3. Which data layers shall be dependent on the scale of the map and the type of illicit discharge reported. See appendix F for a sample map.

Table 3. Map Preparation	
Desired Data layers Outfall Screenings	Desired Data layers Illicit Discharge Investigation
Roads	Roads
Streams	Streams
Outfall Locations	Outfall Locations
City Boundaries	Jurisdictional Boundaries
Aerial Photography	Aerial Photography
	Industrial facilities
	Storm System (inlets, manholes, pipes)
	Water mains
	Sanitary mains

5.4.3 Outfall screening procedures

The primary field screening tool shall be the Stormwater Inspection Outfall form (Appendix C). The basic procedure at each outfall is to take a picture of the outfall and, if the outfall is not already in the City's mapping system, mark the location on the printed map (record location on ArcGIS once back in the office). Next, a Stormwater Inspection Outfall form is completed, which includes recording a description of the outfall (e.g., pipe material, diameter), a description of physical indicators of potential illicit discharges for both flowing and non-flowing outfalls.

If the outfall has dry weather flow, an illicit discharge investigation shall be implemented.

6.0 Illicit Discharge Investigations.

An illicit discharge investigation shall be initiated when one of the identification measures indicates a potential illicit discharge or connection and the source has not been identified.

An illicit discharge source investigation is conducted to isolate the source of the pollution. There are two types of source investigations: Drainage Area Investigations and Storm Drain Investigations. An illicit discharge that is determined to be likely transient in frequency, entering the storm drain system directly through dumping or spills from the landscape shall follow the procedure for a Drainage Area Investigation. A continuous or intermittent discharge that likely occurs from direct or indirect entry into the storm drain system from the interaction of pipes underground shall follow the procedure for a Storm Drain Investigation. Either investigation should be conducted during dry weather. Regardless of the type of investigation the Illicit Discharge Investigation form (Appendix D) shall be utilized.

A rapid windshield survey of the drainage area may be used to find the potential discharger or generating sites if the discharge observed at an outfall has distinct or unique characteristics that allow crews to quickly ascertain the probable operation or business that is generating it. Discharges with a unique color, smell, or off-the-chart indicator sample reading may point to a specific industrial or commercial source.

A rapid windshield survey works well in small drainage areas, particularly if field crews are already familiar with its business operations. Field crews can match the characteristics of the discharge to the most likely type of generating site, and then inspect all of the sites of the same type within the drainage area until the source is found. For example, if fuel is observed at an outfall, crews might quickly check every business operation in the catchment that stores or dispenses fuel.

In larger or more complex drainage areas, GIS data can be analyzed to pinpoint the source of a discharge. If only general land use data exist, maps can at least highlight suspected industrial areas. If more detailed Standard Industrial Classification (SIC) code data are available digitally, GIS may be used to pull up specific hotspot operations or generating sites that could be potential dischargers.

In a Storm Drain Investigation, field crews strategically inspect manholes within the storm drain network system to observe flows or measure chemical or physical indicators that can isolate discharges to a specific segment of the network. Once the pipe segment has been identified, on-site investigations are used to find the specific discharge or improper connection. This method involves progressive screening at select manholes in the storm drain network to narrow the discharge to an isolated pipe segment between two manholes. Field crews need to make two key decisions when conducting a storm drain network investigation—where to start screening in the network and what indicators will be used to determine whether a manhole is considered clean or dirty.

6.1 Illicit Discharge Investigation Procedures

The field crew can sample the pipe network in one of three ways:

- Crews can work progressively up the trunk from the outfall and test manholes along the way.
- Crews can split the trunk into equal segments and test manholes at strategic junctions in the storm drain system.
- Crews can work progressively down from the upper parts of the storm drain network toward the problem outfall.

During a manhole inspection, manholes are opened and inspected for visual evidence of contamination. Where flow is observed, and determined to be contaminated through visual indicators or field monitoring, the upstream tributary storm sewer system is isolated for investigation (e.g. further flow inspection, dye testing, CCTV). No additional downstream manhole inspections are performed unless the observed flow is determined to be uncontaminated or until all upstream illicit connections are identified and removed. Where flow is not observed but an intermittent discharge is suspected in a junction manhole, select inlets to the structure are partially dammed for the next 48 hours when no precipitation is forecasted. Inlets are dammed by blocking a minimal percentage of the pipe diameter at the invert using sandbags, caulking, weirs/plates, or other temporary barriers. The manholes are thereafter re-inspected (prior to any precipitation or snow melt) for the capture of periodic or intermittent flows behind any of the inlet dams. The same visual observations and field testing is completed on any captured flow, and where contamination is identified, abatement is completed prior to inspecting downstream manholes. In addition to documenting investigative efforts in written and photographic form, it is recommended that information and observations regarding the construction, condition, and operation of the structures also be compiled.

Where flow is observed and does not demonstrate obvious indicators of contamination, samples are collected and analyzed and then compared with established benchmark values to determine the likely prominent source of the flow. This information facilitates the investigation of the upstream storm sewer system. Benchmark values may be refined over the course of investigations when compared with the actual incidences of observed flow sources. In those manholes where periodic or intermittent flow is captured through damming inlets, additional laboratory testing (e.g. toxicity, metals, etc.) should be considered where an industrial discharge is suspected. See Monitoring Standard Operating Procedures for guidance on how to collect and analyze samples.

Adequate storm and sanitary sewer mapping is a prerequisite to properly execute a storm drain investigation. As necessary and to the extent possible, infrastructure mapping should be verified in the field and corrected prior to investigations. This effort affords an opportunity to collect additional information such as latitude and longitude coordinates using a global position system (GPS) unit if so desired. To facilitate subsequent investigations, tributary area delineations should be confirmed and junction manholes should be identified during this process.

To facilitate investigations, storm drain infrastructure should be evaluated for the need to be cleaned to remove debris or blockages that could compromise investigations. Such

material should be removed to the extent possible prior to investigations, however, some cleaning may occur concurrently as problems manifest themselves.

Where field monitoring has identified storm sewer systems to be influenced by sanitary flows or washwaters, the tributary area is isolated for implementation of more detailed investigations. Additional manholes along the tributary are inspected to refine the longitudinal location of potential contamination sources (e.g. individual or blocks of homes). Targeted internal plumbing inspections, dye testing, smoke testing or CCTV inspections are then employed to more efficiently confirm discrete flow sources. Consulting services shall be utilized to perform these tests.

6.2 Eliminating Illicit Discharges

Once the source of an illicit discharge has been identified, steps should be taken to eliminate the discharge. Four questions should be answered for each individual illicit discharge to determine how to proceed; the answers will usually vary depending on the source of the discharge.

- 1) Who is responsible?
- 2) What methods will be used to repair?
- 3) How long will the repair take?
- 4) How will removal be confirmed?

Financial responsibility for source removal will typically fall on property owners, the City, or a combination of the two. Methods for removing illicit discharges usually involve a combination of education and enforcement. A process for addressing illicit discharges that focuses on identifying the responsible party and enforcement procedures is presented in Figure 1, while Table 4 presents potential sources of illicit discharges. Additional guidance can be found in Chapter 14 of the Illicit Discharge Detection and Elimination Guidance Manual.

Investigators should use judgment in exercising the right mix of compliance assistance and enforcement with approval of the Stormwater Administrator. Voluntary compliance should be used for first-time, minor offenders. Often, property owners are not even aware of a problem, and are willing to eliminate it when educated. More serious violations or continued non-compliance may warrant a more aggressive, enforcement oriented approach provided it is consistent with Chapter 109 and the City of Rockford Stormwater Division Enforcement Response Plan.

Flow Chart for Corrective Actions

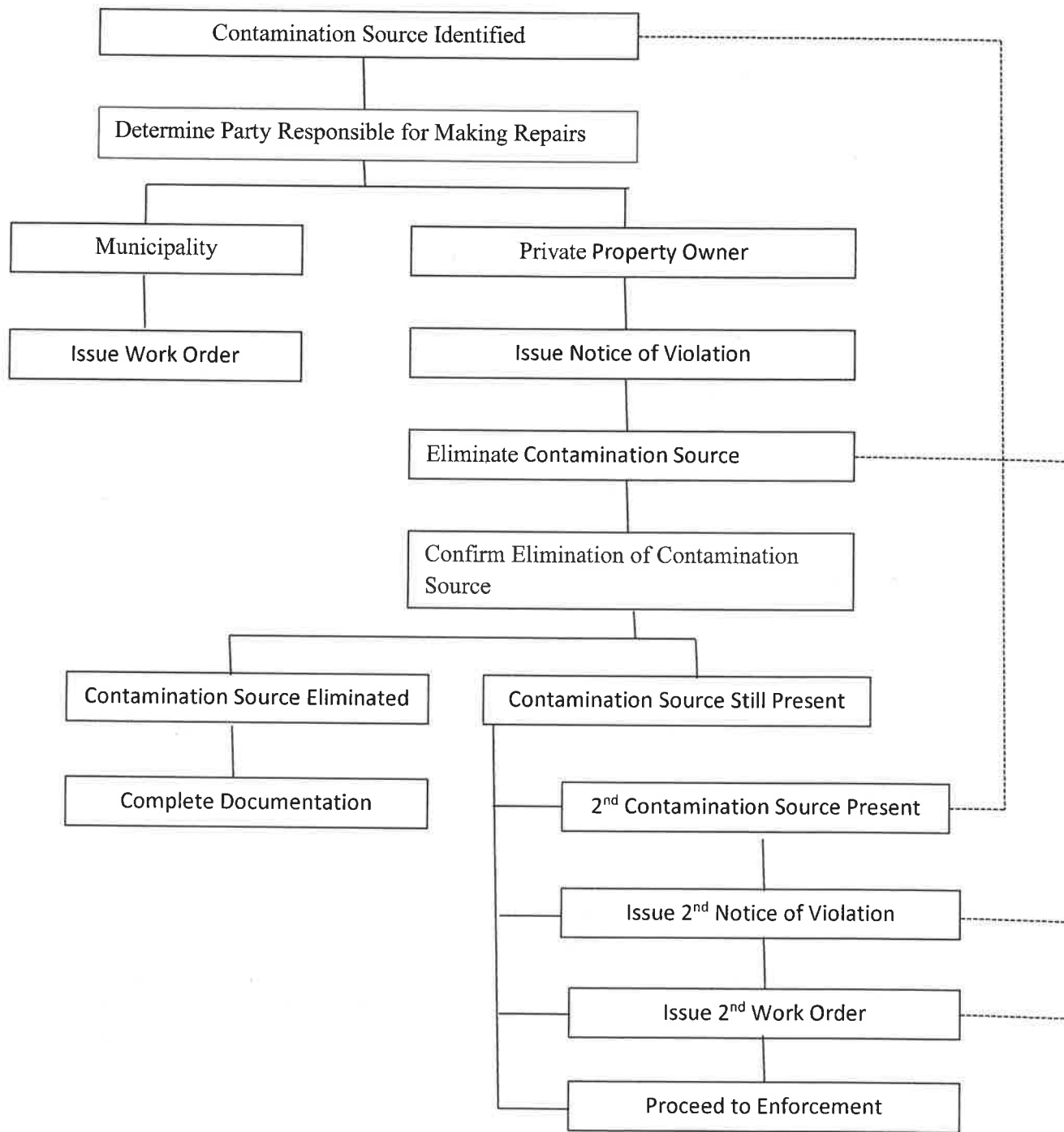


Figure 1: Process for Eliminating an Illicit Discharge

Table 4: Sources of Illicit Discharges	
Type of Discharge	Source
Sewage	Break in right-of-way
	Commercial or industrial direct connection
	Residential direct connection
	Infrequent discharge (e.g., RV dumping)
	Straight pipes/septic
Wash Water	Commercial or industrial direct connection
	Residential direct connection
	Power wash/car wash (commercial)
	Commercial wash down
	Residential car wash or household maintenance related activities
Liquid Wastes	Professional oil change/car maintenance
	Heating oil/solvent dumping
	Homeowner oil change and other liquid waste disposal (e.g., paint)
	Spill (trucking)
	Other industrial wastes

6.3 Post-Removal Confirmation

As the sources of illicit discharges are confirmed, measures to correct them must be taken, working with the property owner or other responsible party. The exact type of repair needed will depend on the type of discharge and mode of transmission.

After completing the removal of illicit discharges from a subdrainage area, it is re-inspected to verify corrections and documented as detailed in in Section 9.0. Depending on the extent and timing of corrections, verification monitoring can be done at the initial junction manhole or the closest downstream manhole to each correction. Verification is accomplished by using the same visual inspection, field monitoring, and damming techniques as described above.

7.0 Illinois Environmental Protection Agency (IEPA) Notifications

IEPA shall be notified within 24 hours should an illicit discharge meet the requirements of the Illinois Emergency Management Agency Emergency Release Notifications (Appendix E). A member of SWET shall perform this notification.

8.0 Enforcement

Enforcement measures will be in accordance with Chapter 109, Article 13 and the City of Rockford Storm Water Division Enforcement Response Plan for corrective actions not remedied within the required timeframe.

9.0 Documentation and Record Management

All outfalls and illicit discharge complaints shall be mapped on the City's GIS system and be hyperlinked to their specific files. This will aid in tracking potential illicit discharges and also allow us to determine problem areas where we may consider focusing education efforts.

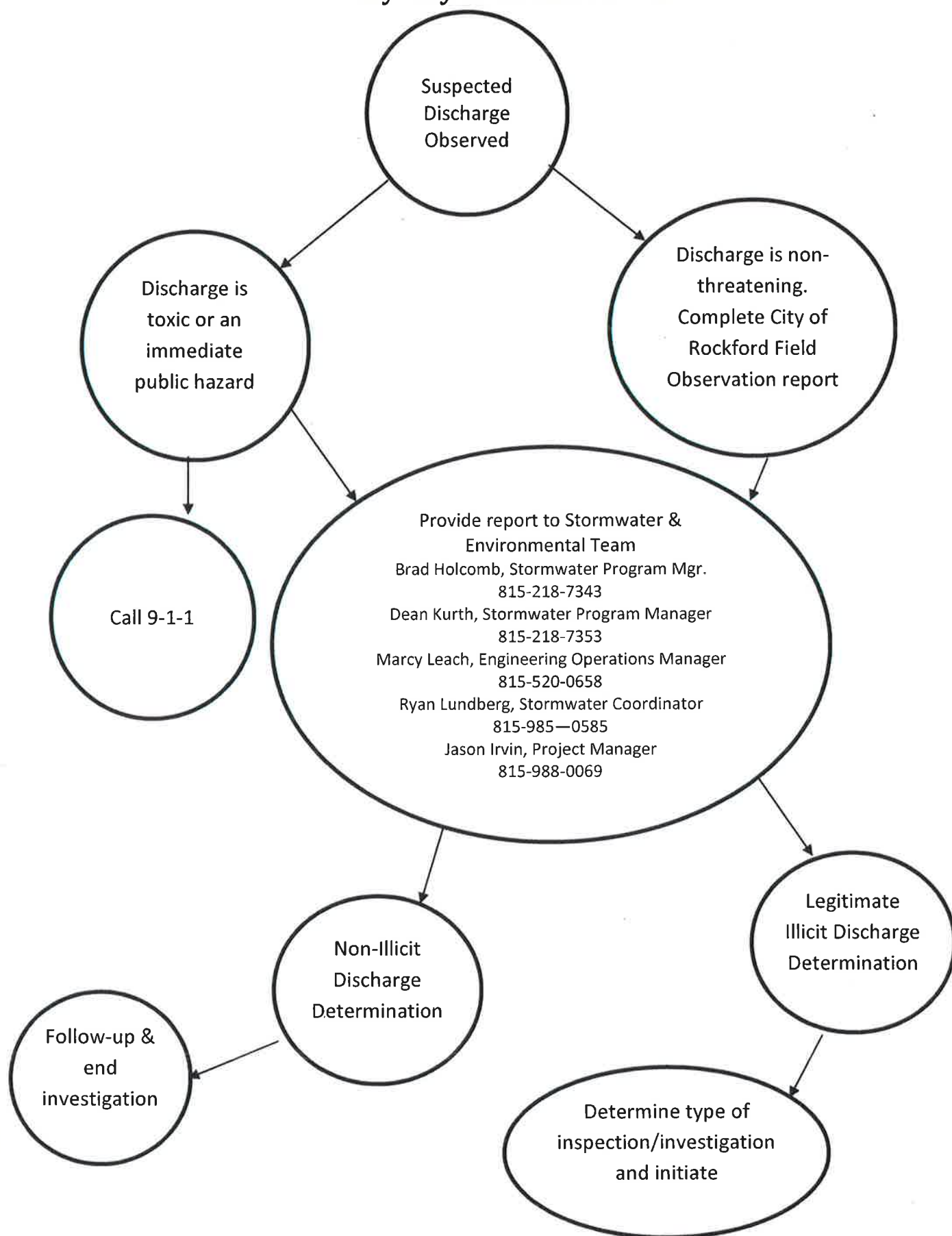
All illicit discharge complaints/investigations (inspection reports and letters) will be filed by address to help track repeat offenders. In addition, digitized copies will also be saved in the Storm Water Drive on the City of Rockford computer system. Digitized information can include: initial observation report, investigation report, photos, correspondence and any other pertinent information. These files will be saved as follows:

- 1) Open the Storm Water Drive (note: this drive has limited access for people who perform duties directly related to the City's storm water program),
- 2) Open the IDDE folder,
- 3) Open the folder for the current year,
- 4) Create a folder with the address and save all data in that folder.

An excel spreadsheet for all investigations has also been created. This inspection and sampling log is saved by year. All complaints/ investigations for that year are saved on this spreadsheet for easy tracking. Data includes: date, location, type of discharge, source (if determined), nature of follow-up and whether corrective actions have been addressed (if applicable). Notes about the investigation can also be included.

Appendix A

ILLICIT DISCHARGE REPORTING AND RESPONSE By City of Rockford Staff



Appendix B

City of Rockford Field Observation

1. Person Making Observation: _____ Date: _____

2. Type of Observation (check all that apply):

_____ Drainageway

_____ Creek

_____ Citizen Complaint

_____ Industrial/Commercial Site

_____ Detention Basin

_____ Outfall Monitoring

_____ Construction Site

_____ Illicit Discharge (If the Illicit Discharge is active contact Brad Holcomb, Dean Kurth or Ryan Lundberg immediately)

_____ Inlet

_____ Other _____

3. Location/Project Name: _____

4. Is this a post rain event observation? _____ Yes _____ No

5. If yes: Date of Rainfall _____ Rainfall amount (inches) _____

6. Is a follow-up inspection required? _____ Yes _____ No

7. Is maintenance needed? _____ Yes _____ No

8. Comments (please be detailed and supply photos if necessary): _____


Signature: _____ Date: _____

Provide Copies to one of the following:

Brad Holcomb, Stormwater Program Manager – Cell # 815-218-7343, brad.holcomb@rockfordil.gov,
Dean Kurth, Stormwater Program Manager – Cell # 815-218-7353, dean.kurth@rockfordil.gov,
Ryan Lundberg, Stormwater Coordinator - Cell # 815-985-0585, ryan.lundberg@rockfordil.gov,
Marcy Leach, Operations Manager – Cell – 815-520-0658, marcy.leach@rockfordil.gov,
Jason Irvin, Project Manager – Cell – 815-988-0069, jason.irvin@rockfordil.gov



Appendix C

 S.W.E.T. <small>Stormwater & Environmental Team</small>		Stormwater Outfall	
Tributary/Watershed:		Date:	Assessed By:
Site ID #:	Time: AM/PM	Photo ID #:	
Location:		GPS ID:	
Bank: <input type="checkbox"/> LT <input type="checkbox"/> RT Head Flow: <input type="checkbox"/> None <input type="checkbox"/> Trickle <input type="checkbox"/> Moderate <input type="checkbox"/> Substantial <input type="checkbox"/> Other: _____	Type: Material: Shape: Submerged: <input type="checkbox"/> Closed <input type="checkbox"/> Concrete <input type="checkbox"/> Metal <input type="checkbox"/> Circular <input type="checkbox"/> Double <input type="checkbox"/> No <input type="checkbox"/> Pipe <input type="checkbox"/> PVC/Plastic <input type="checkbox"/> Brick <input type="checkbox"/> Elliptical <input type="checkbox"/> Triple Diameter: ____ (in) <input type="checkbox"/> Partially <input type="checkbox"/> Other: _____ <input type="checkbox"/> Other: _____ <input type="checkbox"/> Fully <input type="checkbox"/> Open <input type="checkbox"/> Concrete <input type="checkbox"/> Earthen <input type="checkbox"/> Trapezoid Depth: ____ (in) <input type="checkbox"/> Channel <input type="checkbox"/> Other: _____ <input type="checkbox"/> Parabolic Width (Top): ____ (in) <input type="checkbox"/> Other: _____ Width (Bot): ____ (in)		
Condition: <input type="checkbox"/> None <input type="checkbox"/> Chip/Cracked <input type="checkbox"/> Peeling Paint <input type="checkbox"/> Corrosion <input type="checkbox"/> Other: _____	Odor: <input type="checkbox"/> No <input type="checkbox"/> Gas <input type="checkbox"/> Sewage <input type="checkbox"/> Rancid/Sour <input type="checkbox"/> Sulfide <input type="checkbox"/> Other: _____	Deposits/Stains <input type="checkbox"/> None <input type="checkbox"/> Oily <input type="checkbox"/> Flow Line <input type="checkbox"/> Paint <input type="checkbox"/> Other: _____	Veggie Density: <input type="checkbox"/> None <input type="checkbox"/> Normal <input type="checkbox"/> Inhibited <input type="checkbox"/> Excessive <input type="checkbox"/> Other: _____
		Pipe Benthic Growth: <input type="checkbox"/> None <input type="checkbox"/> Brown <input type="checkbox"/> Orange <input type="checkbox"/> Green <input type="checkbox"/> Other: _____ Pool Quality: <input type="checkbox"/> No Pool <input type="checkbox"/> Good <input type="checkbox"/> Odors <input type="checkbox"/> Colors <input type="checkbox"/> Oils <input type="checkbox"/> Suds <input type="checkbox"/> Algae <input type="checkbox"/> Floatables <input type="checkbox"/> Other: _____	
For Flowing Only	Color: <input type="checkbox"/> Clear <input type="checkbox"/> Brown <input type="checkbox"/> Grey <input type="checkbox"/> Yellow <input type="checkbox"/> Green <input type="checkbox"/> Orange <input type="checkbox"/> Red <input type="checkbox"/> Other: _____		
	Turbidity: <input type="checkbox"/> None <input type="checkbox"/> Slight Cloudiness <input type="checkbox"/> Cloudy <input type="checkbox"/> Opaque		
	Floatables: <input type="checkbox"/> None <input type="checkbox"/> Sewage (toilet paper, etc.) <input type="checkbox"/> Petroleum (oil sheen) <input type="checkbox"/> Other: _____		
Other Concerns:	<input type="checkbox"/> Excess Trash (paper/plastic bags) <input type="checkbox"/> Dumping (bulk) <input type="checkbox"/> Excessive Sedimentation <input type="checkbox"/> Needs Regular Maintenance <input type="checkbox"/> Bank Erosion <input type="checkbox"/> Other: _____		
Notes / Sketch:			

Revision: October 2013

Signature: _____ Date: _____

Appendix D

Illicit Discharge Investigation Form

Responder Information (for hotline incidents only)

Call taken by:

Call date:

Reporter Information

Incident time:

Incident date:

Precipitation (inches) in past 24-48 hrs:

Caller contact information (optional):

Incident Location (complete one or more below)

Latitude & longitude:

Stream address or outfall #:

Closest street address:

Nearby landmark:

Primary Location Description**Secondary Location Description:**☐ Stream corridor
(In or adjacent to stream)☐ Outfall☐ In-stream flow☐ Along banks☐ Upland area
(Land not adjacent to stream)☐ Near storm drain☐ Near other water source (storm water pond, wetland, etc.):

Narrative description of location:

Upland Problem Indicator☐ Dumping☐ Oil/solvents/chemicals☐ Sewage☐ Wash water, suds, etc.☐ Other: _____**Stream Corridor Problem Indicator Description**

Odor

☐ None☐ Sewage☐ Rancid/Sour☐ Petroleum (gas)☐ Sulfide (rotten eggs); natural gas☐ Other: Describe in "Narrative" section

Appearance

☐ "Normal"☐ Oil sheen☐ Cloudy☐ Suds☐ Other: Describe in "Narrative" section

Floatables

☐ None☐ Sewage (toilet paper, etc.)☐ Algae☐ Dead fish☐ Other: Describe in "Narrative" section

Narrative description of problem indicators:

Suspected Violator (name, personal or vehicle description, license plate #, etc.):

Data CollectionSample collected for testing? ☐ Yes ☐ NoSample collected from? ☐ Flow ☐ Pool ☐ OtherSample result indicated: ☐ No Pollutants ☐ Presence of pollutants**Investigation Notes**

Initial investigation date:

Investigators:

☐ No investigation made

Reason:

☐ Referred to different department/agency:

Department/Agency:

☐ Investigated: No action necessary☐ Investigated: Requires Action

Description of actions:

Hours between call and investigation:

Notification and Enforcement Actions (if any):

Date case closed:

Notes:

Investigator: (sign & print name) _____

Date of Investigation: _____

Appendix E



Jonathon E. Monken, Director

EMERGENCY RELEASE NOTIFICATION FACT SHEET

A. Immediate telephone notification shall be given by the owner or operator of a facility when a release equal to or exceeding the reportable quantity of an extremely hazardous substance¹ or a CERCLA hazardous substance² occurs at the facility.

In such incidents, notifications are to be made to the following:

- 1. Illinois Emergency Management Agency (IEMA)/State Emergency Response Commission (SERC) at 1-800-782-7860 (within state) or (217) 782-7860 (when calling from out-of-state).**
- 2. Local Emergency Planning Committee (LEPC) that is likely to be affected by the release. The telephone number(s) can be obtained from IEMA.**
- 3. National Response Center (NRC) at 1-800-424-8802 (if the substance is a CERCLA hazardous substance)**

Please Note: Transportation-related incidents only require 9-1-1 notification.

B. Immediate telephone notification is also required if an incident or accident involving a hazardous material³ occurs which results in:

- 1) a member of the general public is killed;
- 2) a member of the general public receives injuries requiring hospitalization;
- 3) an authorized official of an emergency agency recommends an evacuation of an area by the general public;
- 4) a motor vehicle has overturned on a public highway;
- 5) Fire, breakage, release or suspected contamination occurs involving an etiologic agent;
- 6) Any release of petroleum (or oil) that produces a sheen on nearby surface water⁴ and/or threatens navigable waters;
- 7) Any spill or overflow of petroleum that results in a release to the environment that exceeds 15 gallons.⁵

In such incidents, notification shall be made as noted in Paragraph A, above, except no notification is required to the NRC, except items 6 and 7 (oil that impacts water and overfills).

At a minimum, notification shall include:

- 1) the chemical name or identity of any substance involved in the release;
- 2) an indication of whether the substance is an extremely hazardous substance;
- 3) an estimate of the quantity in pounds of any such substance that was released into the environment;
- 4) the time and duration of the release;
- 5) the specific location of the release;
- 6) the medium or media (air, land, water) into which the release occurred;
- 7) any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals;
- 8) proper precautions to take as a result of the release, including evacuations;
- 9) the name and telephone number of the person or persons to be contacted for further information.

WRITTEN FOLLOW-UP NOTICE IS REQUIRED WITH RESPECT TO INCIDENTS AS DESCRIBED IN PARAGRAPH A, ABOVE. As soon as practicable after such release (within 30 days), the owner or operator shall provide a written follow-up emergency notice (or notices, as more information becomes available) to the SERC and the LEPC, updating the information provided in the immediate notification and including additional information with respect to:

- 1) Actions taken to respond to and contain the release;**
- 2) Any known or anticipated acute or chronic health risks associated with the release;**
- 3) Where appropriate, advice regarding medical attention necessary for exposed individuals.**

¹ See 40 CFR 311 for a listing of extremely hazardous substances (EHS).

² See 40 CFR 302.4 for a listing of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) hazardous substances.

³ See 49 CFR 172.101 for a list of hazardous materials.

⁴ See 41 IAC 176-2-40 Reporting and Cleanup of Spills and Overfills.

(These rules are compiled in 29 IAC 430 and 29 IAC 620)

Last Updated 2/2011

EMAP



Appendix F





Timothy Hanson
Director
Public Works Department

June 28, 2013

(Insert address)

Rockford, IL

Notice of Ordinance Violation

Address where violation occurred: , Rockford, IL

It has been brought to the attention of the City of Rockford that automotive waste has been dumped into the City's sewer system by the occupier of the above address. The following ordinance was found to be in violation:

Sec. 26-11.1 Non-Storm Water and Industrial Storm Water Discharge

Non-storm water and industrial storm water discharge is prohibited to the City right-of-way and waters of the State, creeks, streams and rivers except as:

- a) Authorized and in compliance with a separate NPDES permit.
- b) Authorized and in compliance with the City's MS4 NPDES permit.
- c) As permitted and in compliance with the City's Storm Water Ordinance.

Any persons or property found in violation of this section shall be subject to a fine as set forth by the City Council and shall perform remediation to eliminate the discharge.

Sec. 26-11.2. - Depositing refuse in streets and sidewalks

No person shall discharge or dispose of used motor vehicle fluids (including, but not limited to, oil and antifreeze), tires, hazard materials (including, but not limited to, paint, solvents, pesticides and herbicides), refuse or garbage, grass clippings, leaf litter, dirt and animal wastes in or upon any street, alley, sidewalk, storm sewer or other public place except as provided in this Code. Any persons or property found in violation of this section shall be subject to a fine as set forth by city council and shall immediately remove the refuse.

Sec. 109-23 Discharge Prohibitions

- a) **Prohibition of illegal discharges.** No person shall discharge or cause to be discharged into the Storm Drain System or water course any materials including but not limited to pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than storm water.



*Timothy Hanson
Director
Public Works Department*

The area in question must be cleaned up within seven (7) days of the date of this letter and automotive fluids must be properly disposed of. Failure for clean up the site in the required timeframe or any future violations will result in fines and site clean-up.

If you have any questions regarding this violation, please contact our Storm Water and Environmental Program Manager, Brad Holcomb at 815-967-7061 or by email at Brad.Holcomb@rockfordil.gov.

Sincerely,

Matthew Vitner
City Engineer



Timothy Hanson
Director
Public Works Department

Notice of Ordinance Violation, (insert address)

Page 2 of 2

Photo #1

Picture description

Photo #2

Picture description

Photo #3

Picture description

Note: the attached photos indicate examples of corrective actions observed on this construction site. When performing maintenance as indicated in the photos, check the entire site for other areas with similar maintenance needs.

